

**IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF FLORIDA**

ATLANTIC WINDOW CLEANING, INC.

Plaintiff,

v.

Case No.: 22-60409-CIV-SMITH

RACHEL EULER, et al.

Defendants.

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AGREED MOTION TO EXTEND EXPERT DEADLINES

Plaintiff Atlantic Window Cleaning, Inc. hereby moves the Court to extend the parties' expert-related deadlines and states the following in support:

The Court entered the Order Setting Civil Trial Date, Pretrial Deadlines, and Referral to Magistrate (Dkt. 17) on July 22, 2022, which set the following deadlines related to experts:

- Plaintiff shall disclose experts, expert witness summaries, and reports as required by Fed. R. Civ. P. 26(a)(2) by: 09/29/22
- Defendants shall disclose experts, expert witness summaries, and reports as required by Fed. R. Civ. P. 26(a)(2) by: 10/27/22
- Exchange of rebuttal expert witness summaries and reports as required by Fed. R. Civ. P. 26(a)(2) by: 11/18/22

The parties have been engaged in discovery, and Plaintiff has engaged an expert. However, counsel for Plaintiff and its expert are located in Sarasota and Tampa, and Defendants' counsel is located in Orlando, and the preparations for and aftermath of Hurricane Ian have caused both sides delays. While dealing with the hurricane, the parties agreed to a small extension on the expert deadlines but were not yet able to file a motion with the Court. The parties now agree and propose the following new deadlines related to experts:

- Plaintiff shall disclose experts, expert witness summaries, and reports as required by Fed. R. Civ. P. 26(a)(2) by: 10/14/22
- Defendants shall disclose experts, expert witness summaries, and reports as required by Fed. R. Civ. P. 26(a)(2) by: 11/11/22
- Exchange of rebuttal expert witness summaries and reports as required by Fed. R. Civ. P. 26(a)(2) by: 12/5/22

Good cause exists for this Motion given the parties' efforts to move discovery forward and the timing and delays caused by the hurricane. The parties do not expect at this time to have a further need for an extension or for any other deadlines to be extended. The extension request is made in good faith and will not cause prejudice to any party.

WHEREFORE Plaintiff respectfully requests the Court to extend the expert-related deadlines as laid out herein.

Dated: October 7, 2022

Respectfully Submitted,

SHUMAKER, LOOP & KENDRICK, LLP

By: /s/ Mindi M. Richter

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Attorneys for Plaintiff

LOCAL RULE 7.1 CERTIFICATION

The undersigned certifies that she conferred with opposing counsel and they agree to the relief sought herein.

/s/ Mindi M. Richter

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing motion was filed electronically with the Court on October 7, 2022 providing notice to all counsel of record.

/s/ Mindi M. Richter